

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**UNOPPOSED MOTION TO FILE UNDER SEAL
UNDER LOCAL RULE CV-5(a)(7)**

Plaintiff States (“States”) respectfully move the Court for leave to file under seal PLAINTIFF STATES’ MOTION TO EXCLUDE OPINIONS OF ITAMAR SIMONSON and the exhibits thereto, to be filed later today. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, upon Google’s request and with Google’s consent, request to file under seal their brief and exhibits because their brief and exhibits reference, contain, or are materials that Google has designated confidential or highly confidential. Google intends to propose and the parties intend to submit redacted copies of these documents in compliance with Local Rule CV-5(a)(7).

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced documents under seal under Local Rule CV-5(a)(7).

Respectfully submitted,

DATED: November 18, 2024

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Submitted on behalf of all Plaintiff States

Respectfully submitted,

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CERTIFICATION OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Noah S. Heinz
Noah S. Heinz

CERTIFICATE OF SERVICE

I certify that on November 18, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Noah S. Heinz
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